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5401 Boxwood Ln.
Amarillo, TX 79109-7190
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Ms. Carol Hanlon
S&ER Products Manager
U. S. Department of Energy
Yucca Mountain Site Characterization Office
P.O. Box 30307 M/S025
North Las Vegas, NV 89036-0707

Subject: Comments on Yucca Mountain Project

Dear Ms. Hanlon:

I realize that DOE's recent request of ANS for comments was restricted to the Preliminary Site Evaluation document. However, I hope you will be receptive to my comments, copy attached, which relate to current YMP activities.

It would be very much appreciated if you would forward them to the appropriate individual on Secretary Abraham's staff who, hopefully, will see that they are brought to his attention.

As stated in the introduction to my comments, I am a highly recognized ANS individual. What I did not mention, is that I am known by Lake Barrett and have maintained active contact with the project team for some time.

My purpose in submitting these comments is to help assure that the project is successful. They derive, in part, from a history of interfacing with the NRC and from having achieved a lengthy record of successfully assisting power reactor licensees in dealings with that agency.

If I can be of further assistance, I would welcome being contacted. To that end, my phone number is (806) 358-3238, and my E-mail address is 'aramon772@aol.com'.

Sincerely,



Ramon L. Ashley

Attachment: As noted.

**Response to DOE's Request for ANS Member
Comments on the Yucca Mountain Project**
by Ramon L. Ashley

As an elected Emeritus Member of ANS, and one who has long recognized the importance of the YMP, not only to the future of the nuclear power industry, but also to our nation's future supply of much needed electricity, I submit the following, which are not listed in order of priority:

1. *Analytical Safety Reserve Margin:* It is of paramount importance for the YMP to provide an adequate reserve margin (i.e., a tactical set-aside fraction of the required dose acceptance criterion) in its safety analyses, in order to allow for adjustments stemming from NRC review and subsequent hearings.
2. *Facility Design Budget:* A substantial increase, beyond what is provided in FY 2001, for the Surface, Subsurface and Waste Package design functions, is required to support a markedly enhanced design activity. This precursor is requisite for accomplishing, with adequate credibility (i.e., having sufficient design and process details), the necessary design assessments of built-in safety to assure an acceptable level of the radiological consequences from low-consequence, high-frequency events, in order to acceptably meet NRC expectations for authorization of facility startup. This enhanced design activity should not be sidelined during preparation of the license application since the NRC will require sufficient design details as an integral part of the LA review process. Providing adequate lead-time for this activity is mandatory.
3. *Surface Transportation Routes for Used Fuel:* A more realistic selection is warranted of the surface transportation routes from the east to the Nevada site, where the spent fuel is to be loaded into the final storage systems for placement into the repository. It is absolutely essential that this selection be made using, as a top priority, the minimization of potential intervention. If done improperly, it is not outside the realm of possibility that an approved repository could stand unused while virtually endless litigation proceeds.
4. *Culture Change:* A properly designed and implemented culture change program should be a YMP requirement, not only for the local DOE Office, but also, and especially, for the contractor's project team. It should be patterned after successful programs used at nuclear power plants. I identified this need during participation with the TRW project team some seven years ago. An attempt by that contractor about five years later was improperly implemented and failed.